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FILED

JAN - 3 2019

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

Respondent in Pro Per

8
9 **BEFORE THE STATE BAR COURT**
10 **OF THE STATE OF CALIFORNIA**
11 **HEARING DEPARTMENT - LOS ANGELES**

12 In the Matter of

13 **AMIR DIBAEI,**

14 Member No. 275798,

15 A Member of the State Bar
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) Case Nos. 17-O-03848, 17-O-05038

) **RESPONSE TO NOTICE OF
DISCIPLINARY CHARGES**

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1 Respondent Amir Dibaei responds to the Notice of Disciplinary Charges (“NDC”) as
2 follows:

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4
5 1. Respondent admits that he was admitted to the practice of law in the State of
6 California on April 26, 2011, and that he has been a member since that time.

7
8 **COUNT ONE**

9 2. Respondent objects to the allegations of Paragraph 2 of the NDC on the bases that
10 the allegations are contradicted by readily available evidence and facts. Respondent objects as there
11 is a failure to satisfy the requisite burden of proof to bring this NDC. Respondent objects as the
12 allegations are conclusory, compound and intertwined. Respondent objects as the allegations are
13 being substituted as facts to form unsubstantiated legal conclusions. Rule 5-100 requires conduct to
14 obtain an advantage in a civil dispute. Respondent objects to all allegations dated after the civil
15 dispute in which Respondent allegedly attempted to gain an advantage was dismissed on July 10,
16 2017. (see Exhibit p* 2). Accordingly, Respondent objects to all allegations dated thereafter as
17 moot. More than half of the allegations contained in the NDC can be dismissed with a simple
18 review of the case summary. Without waiving this objection, Respondent denies each and every
19 allegation contained in the NDC because it is devoid of a single sentence that contains wholly
20 accurate/truthful/substantiated allegations. The majority of these allegations can be disregarded by
21 reviewing a case summary. Respondent denies the entirety of Paragraph 2 as Respondent
22 participated in BC614174 on November 17, 2016 by filing a notice of limited scope representation.
23 (Exhibit p*6). The dates alleged in the NDC are inaccurate and rely on complainant’s allegations
24 which are include intentional misrepresentations and omissions. The initial investigation of this
25 matter led to the investigator’s conclusion that it should be dismissed. Respondent denies engaging
26 in any of the acts alleged in Paragraph 2, Count One as they fail to explain how they amount to a
27 violation of RPC, rule 5-100. Of the allegations in Paragraph 2(a) through 2(g)—*only 2 allegations*
28 are within the timeframe of the civil dispute in question.

1 2(a) Respondent denies the allegations presented in Paragraph 2(a). If an attorney
2 advocating for a client is the equivalent of “gaining an advantage in a civil dispute” as defined by
3 Rule 5-100—there could be no meaningful representation. The “email to defendants’ counsel and
4 plaintiff’s former counsel” alleges Respondent was threatening “*them*” whomever that may be.
5 Respondent objects to this allegation as it deliberately fails to specify with specificity what
6 transpired. The NDC concludes that the January 6, 2017 email was a violation of Rule 5-100. The
7 allegation lacks specifics to constitute a violation of Rule 5-100. The email referenced in Paragraph
8 2(a) was an ex parte notice. A legitimate, substantiated ex parte notice is a correspondence made in
9 the scope of litigation and is within the California Rules of Court Rule 3.1023 and litigation
10 privilege Civil Code § 47. Respondent’s correspondence served a legitimate purpose in the
11 furtherance of the litigation.

12 2(b) Respondent cannot admit or deny this allegation as no further correspondences
13 involving Respondent, Defendants’ counsel and former Plaintiffs’ counsel were had on this date.
14 To the extent such an allegation is made in the NDC: it is denied as privileged as privileged and
15 protected speech. There is no showing made here to differentiate Respondent’s advocacy for
16 Plaintiffs’ use of speech which is protected and privileged—and that which falls within Rule 5-100
17 “to obtain an advantage in a civil dispute.” Providing notice of an ex parte application is required
18 by the California Rules of Court.

19 2(c) Respondent objects to the allegation in 2(c) as it fails to describe a violation of Rule
20 5-100. The allegation describes a subjective standard whereby Respondent’s conduct is “*impliedly*
21 *threatening*” (NDC 2(c)). The language of Rule 5-100 does not allow for a subjective interpretation
22 as such would open the floodgates of potential violations and lacks objectivity. Without waiving
23 said objections, Respondent denies the allegations made in Paragraph 2(c). The only email between
24 Respondent and defendant on June 7, 2017 is sent by Defendant to Respondent and Plaintiffs. As
25 part of a meet and confer regarding discovery deadlines, Defendant writes to Respondent and
26 Respondent’s Client stating: “*Your obvious attempts to create a paper trail of a false narrative in*
27 *order to make future false accusations is despicable. As are your threats. You are in violation of*
28 *State of California Bar Rule 5-100 Threatening Criminal, Administrative, or Disciplinary Charges.*

1 *I have filed a complaint this afternoon.”* This allegation is wholly misplaced. The allegation
2 describes an example of Respondent being victimized in violation of Rule 5-100—not violating the
3 rule by being subject to threats of State Bar complaints. There can be no violation of Rule 5-100 by
4 Respondent as Respondent is not the speaker or communicator.

5 2(d) Respondent objects to the allegation in 2(d) as it fails to describe a violation of Rule
6 5-100. The allegation describes a subjective standard whereby Respondent’s conduct is “*impliedly*
7 *threatening*” (NDC 2(d)). The language of Rule 5-100 does not allow for a subjective interpretation
8 as such would open the floodgates of potential violations and lacks objectivity. Without waiving
9 said objections, Respondent denies this allegation in its entirety as no correspondences between
10 Respondent and Defendant took place on this date except that sent by Defendant referenced in 2(c).

11 2(e) Respondent objects to the allegation in 2(e) as it fails to describe a violation of Rule
12 5-100. The allegation describes a subjective standard whereby Respondent’s conduct is “*impliedly*
13 *threatening*” (NDC 2(e)). Respondent denies the entirety of the allegation. Rule 5-100 requires the
14 ulterior motive of gaining an advantage in a civil dispute. Here, *the civil dispute in question ended*
15 *2-months prior.*

16 2(f) Respondent denies the entirety of the allegation as its serves to completely
17 undermine the very violation for which it is offered. Moreover, the civil dispute in question ended
18 *3-months after* to the date of this allegation. Respondent expressly identifies Defendant’s counsel
19 as having filed a “frivolous bar complaint” and Respondent continues to expressly reassure
20 Defendant’s former counsel that Respondent *would not* present attorney disciplinary charges
21 against him. Respondent cannot admit or deny any further portions of this allegation as the
22 statement made by Respondent reads: “*I see no need to involve the Judicial Counsel or State Bar to*
23 *conduct their own administrative investigation. Given your recent history I hope you will*
24 *understand that this is actually me extending an Olive Branch and not another alleged violation of*
25 *the rules of professional conduct. But, if you want to go running to the State Bar with a complaint; I*
26 *will be glad to detail the allegations and supporting evidence I have therefore.”* This would appear
27 to be the exact opposite of a violation of Rule 5-100.
28

1 **COUNT TWO**

2 3. Respondent objects to the allegations of Paragraph 3 of the NDC on the bases that
3 they are conclusory, compound and intertwined with legal conclusions. Without waiving this
4 objection, Respondent denies the entirety of Paragraph 3. Respondent sent several emails on July
5 31, 2017 to Toni Kilicoglu Toni Kilicoglu, the defendant and opposing party in *Creative Asset*
6 *Partners, Inc. v. Toni Kilicoglu*, Los Angeles Superior Court case no. 17R00619. Respondent
7 admits that one of these emails states “Judgment recorded. You better show up to court or they will
8 issue your warrant.” Respondent denies that his statements in that email constituted a threat to
9 present criminal charges against Kilicoglu to gain an unfair advantage in a civil suit in willful
10 violation of the Rules of Professional Conduct, rule 5-100(A). Respondent asserts that his
11 statement regarding the issuance of a warrant was in reference to a *bench* warrant that would be
12 issued by the court if Kilicoglu failed to appear, and was in no way a reference to criminal
13 prosecution. Respondent asserts that he was simply informing Kilicoglu of the potential
14 consequences if he failed to appear as he requested to retain new counsel. Respondent’s email was
15 in reference to California Code of Civil Procedure section 708.170(a)(1), which provides: “If an
16 order requiring a person to appear for an examination was served by a sheriff, marshal, a person
17 specially appointed by the court in the order, or a registered process server, and the person fails to
18 appear: The court may (A) Pursuant to a warrant, have the person brought before the court to
19 answer for the failure to appear and may punish the person for contempt [or] (B) Issue a warrant for
20 the arrest of the person who failed to appear as required by the court order, pursuant to Section
21 1993.”

22
23 **COUNT THREE**

24 4. Respondent objects to the allegations of Paragraph 4 of the NDC on the basis that
25 they are conclusory, compound and intertwined with legal conclusions. Without waiving this
26 objection, Respondent admits in part and denies in part the allegations of Paragraph 4. Respondent
27 admits that on July 31, 2017, he sent an email to Toni Kilicoglu, the defendant and opposing party
28 to Respondent’s client in *Creative Asset Partners, Inc. v. Toni Kilicoglu*, Los Angeles Superior

1 Court case no. 17R00619, in which he stated, “Judgment recorded. You better show up to court or
2 they will issue your warrant.” Respondent admits that no proceeding had been instituted for
3 Kilicoglu’s arrest did Respondent ever communicate, threaten or imply same. Respondent asserts
4 that his statements in his July 31, 2017 email did not represent that proceedings for Kilicoglu’s
5 arrest had been initiated, but rather that the court would issue a warrant if Kilicoglu failed to appear,
6 as provided under California Code of Civil Procedure section 708.170(a)(1). Respondent denies
7 that his statements in his July 31, 2017 were false and misleading and denies that no judgment had
8 been entered. *There had been 3 judgments entered at that time.* 1 for possession; 1 for damages;
9 and 1 for Attorney’s fees. (See Exhibit p*23, 20). As evidenced by the case summary, Respondent’s
10 summary judgment motion was granted on April 7, 2017, almost four months before the July 31,
11 2017 email to Kilicoglu, the court granted Creative Asset Partners, Inc.’s motion for summary
12 judgment and entered a judgment against Toni Kilicoglu for possession and damages in the form of
13 unpaid rent; on July 3, 2017, the Court awarded reasonable attorney’s fees of approximately
14 \$20,000 for value of services from February 8 through April 7, 2017. Respondent denies that July
15 31, 2017 email to Kilicoglu was a misrepresentation involving an act of moral turpitude, dishonesty
16 or corruption in willful violation of Business and Professions Code, section 6106; Respondent
17 denies that the allegations contained in Paragraph 4, Count Three are accurate statements of fact.

18 5. Respondent objects to Paragraph 5 as it is a misstatement of law. To the extent that
19 Paragraph 5 includes allegations—those allegations are conclusory and intertwined with legal
20 conclusions. Without waiving this objection, Respondent denies that he made a misrepresentation
21 as a result of gross negligence and further objects as the request for such discipline is per se barred.

22
23 **COUNT FOUR**

24 6. Respondent objects to the allegations of Paragraph 6 of the NDC on the basis that
25 they are conclusory, compound and substitute evidence with a narrative to reach unsubstantiated
26 legal conclusions. Without waiving this objection, Respondent denies the allegations of Paragraph
27 6. Respondent denies any violation of Business and Professions Code § 6106 or engaging in
28 abusive or coercive conduct in collecting a debt greater than the judgment. Respondent vehemently

1 denies and takes offense to any allegations of acts/omissions involving moral turpitude, dishonesty
2 or corruption. Assuming, *en arguendo*, that Respondent admitted to all of the allegations under
3 Count Four [*Paragraph 6(a) through 6(c)*], Respondent would still not be found to have violated
4 §6106. The allegations against Respondent do not cite to any evidence and fail to meet the clear
5 and convincing standard necessary to subject Respondent to this embarrassment before the
6 Judiciary; the State Bar; Respondent's colleagues; Respondent's clients and Respondent's practice.

7 7. Respondent denies the alleged violations of Rule 5-100 and agrees that if true—such
8 conduct is abhorrent and unbecoming of an officer of the Court. Respondent's subjective opinions
9 are of no legal consequence nor does an unsubstantiated opinion constitute law. The allegations,
10 even if true, *do not constitute a violation of §6106*. It has long been established in California's
11 judicial system that a violation of B & P § 6106 requires an *intent to mislead*. Contrary to the
12 allegations: gross negligence is not included within any definition of intentional misrepresentation.
13 Respondent is the party that is being victimized. 18-months ago these allegations were rejected after
14 a State Bar inquiry.

15 8. Count Three and Count Four rely on a factual assertion that "*no judgment had been*
16 *entered.*" This is the bases upon which Respondent is accused of acting with an intent to mislead.
17 At no point in the 18-months has there ever been the allegation that "*no judgment had been entered*"
18 presented to Respondent. More importantly: Respondent has never seen this allegation used as
19 support to prove Respondent's dishonesty or morality.

20 9. The law is clear: *to have a violation of § 6106 there must be an intent to mislead.*

21 10. Respondent's communications were not done with an intent to mislead. Why?
22 Because a judgment had been entered prior to July 31, 2017. In fact, *3-judgments had been*
23 *entered at the time of Respondent's alleged conduct.* It would take less than a minute to
24 investigate the online case summary to verify same.

25 11. Respondent denies and has evidence to prove that the allegations presented herein
26 are selectively chosen quotations; forged evidence; and the result of an investigation that either
27 intentionally or by virtue of gross negligence misrepresented material facts giving rise to this NDC.
28 Respondent has been the one victimized by a violation of Rule 5-100.

1 **Count Three and Four are Communications within the Litigation Privilege**

2 12. Respondent will present evidence to prove the allegations made in the NDC are
3 false. But if Respondent did not have such evidence—there would still be no grounds to pursue
4 these claims based on these allegations.

5 13. The allegations made in the NDC are subject to the litigation privilege Civil Code §
6 47. When it comes to debt collect and Respondent’s “moral turpitude, dishonesty [and] corruption,”
7 the law in California could not be more clear. *Drum v. Bleau, Fox & Associates* 107 Cal.App.4th
8 1009 (2003) addresses this precise issue. In *Drum*, a law firm was subject to an abuse of process
9 claim for wrongfully executing a levy. The second district court of appeals ruled that the litigation
10 “privilege protected communication, not conduct, and the law firm’s levy constituted conduct.”
11 Since 2003, 101 California Federal and State cases have published opinions extending the
12 protection. In 2006, the California Supreme Court extended the privilege to noncommunicative acts
13 that are “necessarily related to communicative conduct, so long as gravamen of action is
14 communicative acts.” *Rusheen v. Cohen* 37 Cal.4th 1048 (2006).

15 14. Respondent’s alleged communications are not a violation of § 6106; the Rosenthal
16 Act; the FDCPA or any other alleged act of Moral Turpitude or Coercive Act.

17 15. Moreover, Respondent Denies attempting to collect a debt greater than the judgment
18 against Kilicoglu. That is a narrative. Respondent’s communications were an attempt to settle all
19 claims arising out of the Court’s 3 judgments—including an expressed finding of fraud which
20 would allow further claims against Toni Kilicoglu. The Court granted judgment against Toni
21 Kilicoglu for all unpaid rents from February through the execution of the writ of possession. On
22 July 3, 2017 the Court awarded \$20,000 for reasonable attorney’s fees *as of April 7, 2017*.
23 Respondent and his Client were entitled to recovery all attorney’s fees, costs and unpaid rents post-
24 judgment as well.

25 16. The NDC states that the judgment against debtor was approximately \$25,000. That
26 would be the judgment amount as of April 7, 2017. Respondent is entitled to recovery all damages,
27 costs and fees *post-judgment* as well which would be from April 7, 2017 through the hearing date
28 on the motion for Attorney’s fees.

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FOURTH AFFIRMATIVE DEFENSE

(Lack of Materiality)

The facts on which some or all of the Notice of Disciplinary Charges are based allege immaterial or irrelevant omissions or statements that do not constitute “misrepresentations” or “concealment.”

FIFTH AFFIRMATIVE DEFENSE

(Litigation Privilege)

All of the conduct described in the NDC is either not within the scope of Rule 5-100 as there is no civil dispute in which to gain an advantage; or there is no advantage whatsoever to be gained. Moreover, all allegations in the NDC are communications which fall within the litigation privilege and therefore cannot be a violation of the Rules of Professional Conduct absent a showing of intent.

WHEREFORE, Respondent prays that the Court find that Respondent did not commit acts constituting professional misconduct, and that the Notice of Disciplinary Charges be dismissed.

Respectfully submitted,

Dated: January 3, 2019

By: 

Amir Dibaei
Respondent in Pro Per

PRINT

NEW SEARCH

CASE INFORMATION

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Case Number: BC614174

SIFTLY.COM LLC ET AL VS THOMAS PULLIAM

Filing Courthouse: Stanley Mosk Courthouse

Filing Date: 03/17/2016

Case Type: Other Commercial/Business Tort (not fraud/ breach of contract) (General Jurisdiction)

Status: Court-Ordered Dismissal - Other (Other) 07/03/2017

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FUTURE HEARINGS

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None

PARTY INFORMATION

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ABDULLA MOHAMMED I. - Attorney for Plaintiff

DIBAEI AMIR SAM - Attorney for Plaintiff

FIRM DELAROSARIO LAW - Attorney for Defendant

PICARIELLO SALVATORE ESQ. - Attorney for Plaintiff

PULLIAM THOMAS - Defendant

SIFTLY.COM LLC - Plaintiff

STRIEFLER FRANK - Plaintiff

DOCUMENTS FILED

[Case Information](#) | [Register Of Actions](#) | [FUTURE HEARINGS](#) | [PARTY INFORMATION](#) | [Documents Filed](#) | [Proceedings Held](#)

Documents Filed (Filing dates listed in descending order)

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

[12/15/2016](#) [07/19/2016](#)

07/10/2017 Partial Dismissal (with Prejudice)

Filed by Cross-Complainant

07/10/2017 REQUEST FOR DISMISSAL

07/03/2017 SUBSTITUTION OF ATTORNEY

07/03/2017 Partial Dismissal (with Prejudice)

Filed by Siftly.com, LLC (Plaintiff)

07/03/2017 Substitution of Attorney

Filed by Plaintiff/Petitioner

07/03/2017 REQUEST FOR DISMISSAL

07/03/2017 SUBSTITUTION OF ATTORNEY

04/28/2017 Substitution of Attorney

Filed by Thomas Pulliam (Defendant)

04/28/2017 SUBSTITUTION OF ATTORNEY-CIVIL (WITHOUT COURT ORDER)

04/04/2017 SUPPLEMENTAL DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFF SIFTLY.COM, LLC'S MOTION FOR RECONSIDERATION

04/04/2017 Declaration

Filed by Thomas Pulliam (Defendant)

04/03/2017 Writ issued

Filed by Creditor

03/30/2017 ORDER RE: MOTION FOR RECONSIDERATION RE: MOTION TO COMPEL FURTHER RESPONSES TO: FORM INTERROGATORIES; ADMISSIONS; PRODUCTION OF DOCUMENTS.

03/30/2017 Order

Filed by Court

03/30/2017 Minute Order

03/29/2017 Minute Order

03/23/2017 SLFFLY.COM'S REPLY TO TIMELINESS OF MOTION FOR RECONSIDERATION

03/23/2017 AMENDMENT TO DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFF SIFTLY.COM, LLC'S MOTION FOR RECONSIDERATION

03/23/2017 SIFTLY.COM'S REPLY TO DEFENDANT'S OPPOSITION

03/23/2017 Order

Filed by Court

03/23/2017 SIFFLY.COM'S REPLY RE: TIMELINESS OF MOTIONS TO COMPEL/MOTIONS TO COMPEL FURTHER RESPONSES

03/23/2017 Minute Order

03/22/2017 SIFTLY.COM'S REPLY TO DEFENDANT'S OPPOSITION

03/22/2017 SIFTLY.COM'S REPLY RE: TIMELINESS OF MOTIONS TO COMPEL/MOTIONS TO COMPEL FURTHER RESPONSES

03/22/2017 SIFTLY.COM'S REPLY TO TIMELINESS OF MOTION FOR RECONSIDERATION

03/20/2017 Writ-Other Issued

Filed by Creditor

03/16/2017 DEFENDANT & CROSSCOMPLAINANT THOMAS PULLIAM'S STATUTORY OFFER TO COMPROMISE (C.C.P. 998) TO PLAINTIFF & CROSS-DEFENDANT, SIFTLY.COM, LLC; REQUEST TO ENTER JUDGMENT

03/16/2017 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFFS MOTION FOR RECONSIDERATION

03/16/2017 DEFENDANT & CROSSCOMPLAINANT THOMAS PULLIAM'S STATUTORY OFFER TO COMPROMISE (C.C.P. 998) TO PLAINTIFF & CROSS-DEFENDANT, FRANK STRIEFLER; REQUEST TO ENTER JUDGMENT

03/16/2017 DEFENDANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFFS' MOTION FOR RECONSIDERATION; ETC

03/15/2017 NOTICE OF CHANGE OF ADDRESS OR OTHER CONTACT INFORMATION

03/15/2017 Notice of Change of Address or Other Contact Information

Filed by Defendant/Respondent

03/14/2017 Proof of Service Personal Service

03/07/2017 SIFTLY.COM, LLC S NOTICE OF MOTION AND MOTION FOR RECONSIDERATION RE: MOTION TO COMPEL FURTHER RESPONSES ETC.

03/07/2017 DECLARATION OF PLAINTIFF'S COUNSEL RE TIMELY FAX FILING ETC.

03/07/2017 DECLARATION OF PLAINTIFF'S COUNSEL RE: COLLUSION BETWEEN PLAINTIFFS' FORMER COUNSEL FORTIS, LLP AND DEFENDANT'S COUNSEL

03/07/2017 PROOF OF SERVICE: MOTION FOR RECONSIDERATION

03/07/2017 AMENDED: DECLARATION OF COUNSEL IN SUPPORT OF PLAINTIFF'S MOTION FOR RECONSIDERATION

03/07/2017 DECLARATION OF SIFTLU.COM, LLC'S IN SUPPORT OF MOTION FOR RECONSIDERATION

02/06/2017 DECLARATION OF COUNSEL IN SUPPORT OF PLAINTIFF'S MOTION FOR RECONSIDERATION

02/06/2017 SIFTLY.COM, LLC'S NOTICE OF MOTION AND MOTION FOR RECONSIDERATION RE: MOTION TO COMPEL FURTHER RESPONSES TO: FORM INTERROGATORIES; ADMISSIONS; PRODUCTION OF DOCUMENTS;

02/06/2017 DECLARATION OF SIFTLY.COM, LLC'S IN SUPPORT OF MOTION FOR RECONSIDERATION

01/19/2017 NOTICE OF RULING AND ENTRY OF ORDER RE: PLAINTIFFS' MOTIONS TO COMPEL FURTHER RESPONSES

01/18/2017 Minute Order

01/18/2017 ORDER RE: (1) PLAINTIFFS SIFTLY.COM AND STRIEFLER MOTION TO COMPEL DEFENDANT PULLIAM S FURTHER RESPONSES TO ADMISSIONS (2) PLAINTIFFS SIFTLY.COM AND STRIEFLER MOTION TO COMPEL DEFENDANT PULLIAM S FURTHER RESPONSES TO FORM INTERROGATORIES (SET 1) (3) PL

01/18/2017 Proof of Service (not Summons and Complaint)

Filed by Thomas Pulliam (Defendant)

01/18/2017 Order

Filed by Court

01/18/2017 PROOF OF SERVICE

01/09/2017 Minute Order

01/05/2017 SUBSTITUTION OF ATTORNEY

01/05/2017 SUBSTITUTION OF ATTORNEY

01/04/2017 DEFENDANT & CROSS-COMPLAINANT THOMAS PULLIAM'S OBJECTIONS TO PLAINTIFFS' REQUEST FOR JUDICIAL NOTICE

01/04/2017 DEFENDANT THOMAS PULLIAM'S AMENDED MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS ETC.

01/04/2017 AMENDED DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS-COMPLAINANT ETC.

01/04/2017 DEFENDANT THOMAS PULLIAM'S AMENDED MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES ETC.

01/04/2017 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS-COMPLAINANT ETC.

01/04/2017 AMENDED DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS-COMPLAINANT ETC.

01/04/2017 DEFENDANT THOMAS PULLIAM'S AMENDED MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION ETC.

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

TOP 12/15/2016 07/19/2016

12/15/2016 SUBSTITUTION OF ATTORNEY

12/15/2016 Substitution of Attorney

Filed by Plaintiff/Petitioner

12/15/2016 SUBSTITUTION OF ATTORNEY

12/13/2016 PLAINTIFFS' OBJECTIONS: MOTIONS TO COMPEL FURTHER RESPONSES

12/13/2016 Request for Judicial Notice

Filed by Siftly.com, LLC (Plaintiff)

12/13/2016 DECLARATION OF COUNSEL IN SUPPORT OF PLAINTIFFS' OBJECTION

12/13/2016 PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE OF EXHIBITS IN SUPPORT OF PLAINTIFFS OBJECTION TO OPPOSITION TO MOTION TO COMPEL FURTHER RESPONSES

12/13/2016 Proof of Service

12/07/2016 PROOF OF SERVICE

12/07/2016 STIPULATION TO CONTINUE DISCOVERY MOTION HEARINGS; ORDER

12/07/2016 Proof of Service (not Summons and Complaint)

Filed by Thomas Pulliam (Defendant)

12/07/2016 Stipulation and Order

Filed by Siftly.com, LLC (Plaintiff)

12/05/2016 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR SANCTIONS

12/05/2016 DEFENDANT & CROSS-COMPLAINANT THOMAS PULLIAM'S MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS AND FOR SANCTIONS; ETC.

12/05/2016 DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S MEMORANDUM IN OPPOSITION TO PLAINTIFFSD MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES AND FOR SANCTIONS; DECLARATION OF MARK DELROSARIO, ESQ.; REQUEST FOR \$13,469.00 IN SANCTIONS.

12/05/2016 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES AND FOR SANCTIONS

12/05/2016 Declaration

Filed by Thomas Pulliam (Defendant)

12/05/2016 Declaration

Filed by Thomas Pulliam (Defendant)

12/05/2016 Memorandum - Other

Filed by Thomas Pulliam (Defendant)

12/05/2016 Declaration

Filed by Thomas Pulliam (Defendant)

12/05/2016 Memorandum - Other

Filed by Thomas Pulliam (Defendant)

12/05/2016 Memorandum - Other

Filed by Thomas Pulliam (Defendant)

12/05/2016 Declaration

Filed by Thomas Pulliam (Defendant)

12/05/2016 DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR SANCTIONS; DECLARATION OF MARK DELROSARIO, ESQ.; REQUEST FOR \$11,649.00 IN SANCTIONS

12/05/2016 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR SANCTIONS

12/05/2016 DECLARATION OF DEFENDANT THOMAS PULLIAM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR SANCTIONS

11/23/2016 NOVEMBER 22, 2016 PROOF OF SERVICE FOR PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES

11/23/2016 Declaration

Filed by Plaintiff/Petitioner

11/23/2016 PLAINTIFF'S AMENDED NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES TO ADMISSIONS;

11/23/2016 DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES REQUEST FOR MONETARY SANCTIONS IN THE AMOUNT OF \$7,360.00

11/23/2016 PLAINTIFF'S SEPARATE STATEMENT IN SUPPORT OF IT'S COMPEL FURTHER RESPONSES TO REQUEST FOR ADMISSIONS SET-1

11/22/2016 PLAINTIFF'S NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES TO ADMISSIONS; ETC.

11/17/2016 MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS; REQUEST FOR SANCTIONS \$5,305.50

11/17/2016 DECLARATION IN SUPPORT OF ATTORNEY'S MOTION TO BE RELIEVED AS COUNSEL

11/17/2016 AMENDED SEPARATE STATEMENT IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES FOR REQUEST FOR PRODUCTION OF DOCUMENTS SET-1

11/17/2016 Miscellaneous-Other

Filed by Siftly.com, LLC (Plaintiff)

11/17/2016 Declaration

Filed by Plaintiff/Petitioner

11/17/2016 Notice

Filed by Frank Striefler (Plaintiff)

11/17/2016 Notice

Filed by Frank Striefler (Plaintiff)

11/17/2016 Proof of Service (not Summons and Complaint)

Filed by Siftly.com, LLC (Plaintiff)

11/17/2016 NOTICE OF LIMITED SCOPE REPRESENTATION; ETC.

11/17/2016 DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION, SET-1; REQUEST FOR MONETARY SANCTIONS

11/17/2016 DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1; REQUEST FOR MONETARY SANCTIONS IN THE AMOUNT OF \$10,088.25

11/17/2016 AMENDED PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1; REQUEST FOR MONETARY SANCTIONS IN THE AMOUNT OF \$10,088.25.

11/17/2016 NOTICE OF LIMITED SCOPE REPRESENTATION

11/17/2016 AMENDED SEPARATE STATEMENT IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1

11/17/2016 Proof of Service

11/17/2016 NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL

11/16/2016 NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL CIVIL

11/14/2016 Motion to Be Relieved as Counsel

Filed by Plaintiff/Petitioner

11/14/2016 DECLARATION IN SUPPORT OF ATTORNEY'S MOTION TO BE RELIEVED AS COUNSEL CIVIL

11/14/2016 NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL CIVIL

11/07/2016 Proof of Service (not Summons and Complaint)

Filed by Siftly.com, LLC (Plaintiff)

11/07/2016 Proof of Service

11/04/2016 SEPARATE STATEMENT IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES

11/04/2016 Miscellaneous-Other

Filed by Siftly.com, LLC (Plaintiff)

11/04/2016 Motion to Compel

Filed by Siftly.com, LLC (Plaintiff)

11/04/2016 Motion to Compel

Filed by Siftly.com, LLC (Plaintiff)

11/04/2016 COMPENDIUM OF EXHIBITS IN SUPPORT OF: PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO PRODUCTION OF DOCUMENTS

11/04/2016 DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES; REQUEST FOR MONETARY SANCTIONS

11/04/2016 MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS; REQUEST FOR SANCTIONS \$5,305.50

10/27/2016 SEPARATE STATEMENT IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1

10/27/2016 Minute Order

10/27/2016 Declaration

Filed by Siftly.com, LLC (Plaintiff)

10/27/2016 Miscellaneous-Other

Filed by Siftly.com, LLC (Plaintiff)

10/27/2016 Motion to Compel

Filed by Siftly.com, LLC (Plaintiff)

10/27/2016 Motion to Compel

Filed by Siftly.com, LLC (Plaintiff)

10/27/2016 Ex-Parte Application

Filed by Siftly.com, LLC (Plaintiff)

10/27/2016 EX PARTE APPLICATION TO EXTEND 45-DAY DEADLINE TO FILE MOTIONS TO COMPEL FURTHER RESPONSES; DECLARATION OF COUNSEL

10/27/2016 DECLARATION OF PLAINTIFF'S ASSOCIATE COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1; REQUEST FOR MONETARY SANCTIONS IN THE AMOUNT OF \$10,08&25

10/27/2016 PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-I; REQUEST FOR MONETARY SANCTIONS IN THE AMOUNT OF \$10,088.25.

10/03/2016 Answer to Cross-Complaint
Filed by Siftly.com, LLC (Plaintiff)

10/03/2016 PLAINTIFFS AND CROSS-DEFENDANTS' ANSWER TO CROSS-COMPLAINT.

09/23/2016 CIVIL DEPOSIT

09/16/2016 Stipulation
Filed by Siftly.com, LLC (Plaintiff); Frank Striefler (Plaintiff)

09/16/2016 STIPULATION TO ACCEPT ELECTRONIC SERVICE OF DOCUMENTS

09/13/2016 CASE MANAGEMENT ORDER

09/13/2016 Case Management Order
Filed by Court

09/13/2016 Minute Order

09/13/2016 NOTICE OF CASE MANAGEMENT CONFERENCE RULING

09/12/2016 DEFENDANT THOMAS PULLIAM'S FIRST AMENDED ANSWER TO THE FIRST AMENDED COMPLAINT

09/12/2016 Amended Answer
Filed by Thomas Pulliam (Defendant)

09/12/2016 CASE MANAGEMENT STATEMENT

09/09/2016 CASE MANAGEMENT STATEMENT

09/09/2016 Case Management Statement
Filed by Thomas Pulliam (Defendant)

08/16/2016 Minute Order

08/16/2016 CROSS-COMPLAINT FOR DAMAGES AND EQUITABLE RELIEF FOR: 1. BREACH OF FIDUCIARY DUTY ; ETC

08/16/2016 DEFENDANT THOMAS PULLIAM'S ANSWER TO THE FIRST AMENDED COMPLAINT

08/16/2016 Cross-Complaint
Filed by Thomas Pulliam (Defendant)

08/16/2016 Answer to First Amended Complaint
Filed by Defendant/Respondent

07/28/2016 Notice
Filed by Siftly.com, LLC (Plaintiff); Frank Striefler (Plaintiff)

07/28/2016 REQUEST FOR ENTRY OF DEFAULT 1ST AMENDED COMPLAINT

07/28/2016 NOTICE OF CONTINUED CASE MANAGEMENT CONFERENCE

07/28/2016 Request for Entry of Default / Judgment
Filed by Plaintiff/Petitioner

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

TOP 12/15/2016 07/19/2016

07/19/2016 Minute Order

07/12/2016 Request for Entry of Default / Judgment
Filed by Plaintiff/Petitioner

07/12/2016 REQUEST FOR ENTRY OF DEFAULT

06/21/2016 Minute Order

06/17/2016 Case Management Statement
Filed by Siftly.com, LLC (Plaintiff)

06/17/2016 Proof of Service (not Summons and Complaint)
Filed by Siftly.com, LLC (Plaintiff)

06/17/2016 CASE MANAGEMENT STATEMENT

06/17/2016 PROOF OF SERVICE OF SUMMONS

05/23/2016 First Amended Complaint
Filed by Siftly.com, LLC (Plaintiff)

05/23/2016 FIRST AMENDED COMPLAINT

05/09/2016 Notice of Change of Address or Other Contact Information
Filed by Siftly.com, LLC (Plaintiff); Frank Striefeler (Plaintiff)

05/09/2016 NOTICE OF CHANGE OF ADDRESS OR OTHER CONTACT INFORMATION

04/21/2016 NOTICE OF CASE MANAGEMENT CONFERENCE

04/21/2016 Notice of Case Management Conference
Filed by Clerk

03/25/2016 Minute Order

03/21/2016 PEREMPTORY CHALLENGE BY PLAINTIFFS SIFTLY.COM LLC AND FRANK STRIEFLER PURSUANT TO CODE OF CIVIL PROCEDURE SECTION 170.6; DECLARATION OF SALVATORE PICARIELLO

03/21/2016 Challenge To Judicial Officer - Peremptory (170.6)
Filed by Siftly.com, LLC (Plaintiff)

03/17/2016 COMPLAINT FOR: (1) BREACH OF FIDUCIARY DUTY; ETC

03/17/2016 SUMMONS

03/17/2016 Complaint
Filed by Siftly.com, LLC (Plaintiff); Frank Striefeler (Plaintiff)

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:
TOP 12/15/2016 07/19/2016

PROCEEDINGS HELD

[Case Information](#) | [Register Of Actions](#) | [FUTURE HEARINGS](#) | [PARTY INFORMATION](#) | [Documents Filed](#) | [Proceedings Held](#)

Proceedings Held (Proceeding dates listed in descending order)

09/05/2017 at 08:30 AM in Department 32
Jury Trial

08/24/2017 at 08:30 AM in Department 32
Final Status Conference

03/30/2017 at 1:30 PM in Department 32
Court Order (Court Order; Court makes order) -

03/29/2017 at 08:36 AM in Department 32
Hearing on Motion for Reconsideration - **Held - Taken under Submission**

03/23/2017 at 00:00 AM in Department 1
(Order ReRelated Cases; Court makes order) -

01/18/2017 at 08:30 AM in Department 32
(Motion to Compel; Denied) -

01/09/2017 at 08:36 AM in Department 32
Hearing on Motion to be Relieved as Counsel (Motion to be Relieved as Counsel; Off Calendar) -

12/16/2016 at 08:36 AM in Department 32
(Motion to Compel; Continued by Stipulation) -

10/27/2016 at 08:30 AM in Department 32
Ex-Parte Proceedings (Ex Parte Motion; Denied) -

09/13/2016 at 08:30 AM in Department 32
Case Management Conference (Conference-Case Management; Trial Date Set) -

08/16/2016 at 08:30 AM in Department 32
Case Management Conference (Conference-Case Management; Continued by Court) -

07/19/2016 at 08:30 AM in Department 32
Case Management Conference (Conference-Case Management; Continued by Court) -

06/21/2016 at 08:30 AM in Department 32
Case Management Conference (Conference-Case Management; Continued by Court) -

03/25/2016 at 08:30 AM in Department 52
Unknown Event Type - **Held - Motion Granted**

REGISTER OF ACTIONS

[Case Information](#) | [Register Of Actions](#) | [FUTURE HEARINGS](#) | [PARTY INFORMATION](#) | [Documents Filed](#) | [Proceedings Held](#)

Register of Actions (Listed in descending order)

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:
01/05/2017 09/09/2016

09/05/2017 at 08:30 AM in Department 32
Jury Trial

08/24/2017 at 08:30 AM in Department 32
Final Status Conference

07/10/2017 REQUEST FOR DISMISSAL

07/10/2017 Partial Dismissal (with Prejudice)
Filed by Cross-Complainant

07/03/2017 REQUEST FOR DISMISSAL

07/03/2017 SUBSTITUTION OF ATTORNEY

07/03/2017 Partial Dismissal (with Prejudice)
Filed by Siftly.com, LLC (Plaintiff)

07/03/2017 Substitution of Attorney
Filed by Plaintiff/Petitioner

07/03/2017 SUBSTITUTION OF ATTORNEY

04/28/2017 Substitution of Attorney
Filed by Thomas Pulliam (Defendant)

04/28/2017 SUBSTITUTION OF ATTORNEY-CIVIL (WITHOUT COURT ORDER)

04/04/2017 SUPPLEMENTAL DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT THOMAS PULLIAM'S
OPPOSITION TO PLAINTIFF SIFTLY.COM, LLC'S MOTION FOR RECONSIDERATION

04/04/2017 Declaration
Filed by Thomas Pulliam (Defendant)

04/03/2017 Writ issued
Filed by Creditor

03/30/2017 at 1:30 PM in Department 32
Court Order (Court Order; Court makes order) -

03/30/2017 ORDER RE: MOTION FOR RECONSIDERATION RE: MOTION TO COMPEL FURTHER RESPONSES TO: FORM
INTERROGATORIES; ADMISSIONS; PRODUCTION OF DOCUMENTS.

03/30/2017 Minute Order

03/30/2017 Order
Filed by Court

03/29/2017 at 08:36 AM in Department 32
Hearing on Motion for Reconsideration - **Held - Taken under Submission**

03/29/2017 Minute Order

03/23/2017 at 00:00 AM in Department 1
(Order ReRelated Cases; Court makes order) -

03/23/2017 Order
Filed by Court

03/23/2017 SIFTLY.COM'S REPLY TO DEFENDANT'S OPPOSITION

03/23/2017 SIFFLY.COM'S REPLY RE: TIMELINESS OF MOTIONS TO COMPEL/MOTIONS TO COMPEL FURTHER RESPONSES

03/23/2017 Minute Order

03/23/2017 SLFFLY.COM'S REPLY TO TIMELINESS OF MOTION FOR RECONSIDERATION

03/23/2017 AMENDMENT TO DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT THOMAS
PULLIAM'S OPPOSITION TO PLAINTWF SIFTLY.COM, LLC'S MOTION FOR RECONSIDERATION

03/22/2017 SIFTLY.COM'S REPLY RE: TIMELINESS OF MOTIONS TO COMPEL/MOTIONS TO COMPEL FURTHER RESPONSES

03/22/2017 SIFTLY.COM'S REPLY TO TIMELINESS OF MOTION FOR RECONSIDERATION

03/22/2017 SIFTLY.COM'S REPLY TO DEFENDANT'S OPPOSITION

03/20/2017 Writ-Other Issued
Filed by Creditor

03/16/2017 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT THOMAS PULLIAM S OPPOSITION TO
PLAINTIFFS MOTION FOR RECONSIDERATION

03/16/2017 DEFENDANT & CROSSCOMPLAINANT THOMAS PULLIAM'S STATUTORY OFFER TO. COMPROMISE (C.C.P. 998) TO
PLAINTIFF & CROSS-DEFENDANT, FRANK STRIEFLER; REQUEST TO ENTER JUDGMENT

03/16/2017 DEFENDANT & CROSSCOMPLAINANT THOMAS PULLIAM'S STATUTORY OFFER TO COMPROMISE (C.C.P. 998) TO
PLAINTIFF & CROSS-DEFENDANT, SIFTLY.COM, LLC; REQUEST TO ENTER JUDGMENT

03/16/2017 DEFENDANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFFS' MOTION FOR RECONSIDERATION; ETC

03/15/2017 Notice of Change of Address or Other Contact Information

Filed by Defendant/Respondent

03/15/2017 NOTICE OF CHANGE OF ADDRESS OR OTHER CONTACT INFORMATION

03/14/2017 Proof of Service Personal Service

03/07/2017 PROOF OF SERVICE: MOTION FOR RECONSIDERATION

03/07/2017 AMENDED: DECLARATION OF COUNSEL IN SUPPORT OF PLAINTIFF'S MOTION FOR RECONSIDERATION

03/07/2017 DECLARATION OF SIFTLU.COM, LLC'S IN SUPPORT OF MOTION FOR RECONSIDERATION

03/07/2017 DECLARATION OF PLAINTIFF'S COUNSEL RE: COLLUSION BETWEEN PLAINTIFFS' FORMER COUNSEL FORTIS, LLP AND DEFENDANT'S COUNSEL

03/07/2017 DECLARATION OF PLAINTIFF'S COUNSEL RE TIMELY FAX FILING ETC.

03/07/2017 SIFTLY.COM, LLC S NOTICE OF MOTION AND MOTION FOR RECONSIDERATION RE: MOTION TO COMPEL FURTHER RESPONSES ETC.

02/06/2017 SIFTLY.COM, LLC'S NOTICE OF MOTION AND MOTION FOR RECONSIDERATION RE: MOTION TO COMPEL FURTHER RESPONSES TO: FORM INTERROGATORIES; ADMISSIONS; PRODUCTION OF DOCUMENTS;

02/06/2017 DECLARATION OF SIFTLY.COM, LLC'S IN SUPPORT OF MOTION FOR RECONSIDERATION

02/06/2017 DECLARATION OF COUNSEL IN SUPPORT OF PLAINTIFF'S MOTION FOR RECONSIDERATION

01/19/2017 NOTICE OF RULING AND ENTRY OF ORDER RE: PLAINTIFFS' MOTIONS TO COMPEL FURTHER RESPONSES

01/18/2017 at 08:30 AM in Department 32

(Motion to Compel; Denied) -

01/18/2017 Proof of Service (not Summons and Complaint)

Filed by Thomas Pulliam (Defendant)

01/18/2017 Order

Filed by Court

01/18/2017 PROOF OF SERVICE

01/18/2017 Minute Order

01/18/2017 ORDER RE: (1) PLAINTIFFS SIFTLY.COM AND STRIEFLER MOTION TO COMPEL DEFENDANT PULLIAM S FURTHER RESPONSES TO ADMISSIONS (2) PLAINTIFFS SIFTLY.COM AND STRIEFLER MOTION TO COMPEL DEFENDANT PULLIAM S FURTHER RESPONSES TO FORM INTERROGATORIES (SET 1) (3) PL

01/09/2017 at 08:36 AM in Department 32

Hearing on Motion to be Relieved as Counsel (Motion to be Relieved as Counsel; Off Calendar) -

01/09/2017 Minute Order

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

TOP 01/05/2017 09/09/2016

01/05/2017 SUBSTITUTION OF ATTORNEY

01/05/2017 SUBSTITUTION OF ATTORNEY

01/04/2017 AMENDED DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS- COMPLAINANT ETC.

01/04/2017 DEFENDANT THOMAS PULLIAM'S AMENDED MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES ETC.

01/04/2017 DEFENDANT & CROSS-COMPLAINANT THOMAS PULLIAM'S OBJECTIONS TO PLAINTIFFS' REQUEST FOR JUDICIAL NOTICE

01/04/2017 DEFENDANT THOMAS PULLIAM'S AMENDED MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION ETC.

01/04/2017 AMENDED DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS- COMPLAINANT ETC.

01/04/2017 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS-COMPLAINANT ETC.

01/04/2017 DEFENDANT THOMAS PULLIAM'S AMENDED MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS ETC.

12/16/2016 at 08:36 AM in Department 32
(Motion to Compel; Continued by Stipulation) -

12/15/2016 SUBSTITUTION OF ATTORNEY

12/15/2016 Substitution of Attorney
Filed by Plaintiff/Petitioner

12/15/2016 SUBSTITUTION OF ATTORNEY

12/13/2016 Request for Judicial Notice
Filed by Siftly.com, LLC (Plaintiff)

12/13/2016 DECLARATION OF COUNSEL IN SUPPORT OF PLAINTIFFS' OBJECTION

12/13/2016 PLAINTIFFS' OBJECTIONS: MOTIONS TO COMPEL FURTHER RESPONSES

12/13/2016 PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE OF EXHIBITS IN SUPPORT OF PLAINTIFFS OBJECTION TO OPPOSITION TO MOTION TO COMPEL FURTHER RESPONSES

12/13/2016 Proof of Service

12/07/2016 Proof of Service (not Summons and Complaint)
Filed by Thomas Pulliam (Defendant)

12/07/2016 Stipulation and Order
Filed by Siftly.com, LLC (Plaintiff)

12/07/2016 PROOF OF SERVICE

12/07/2016 STIPULATION TO CONTINUE DISCOVERY MOTION HEARINGS; ORDER

12/05/2016 DECLARATION OF DEFENDANT THOMAS PULLIAM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR SANCTIONS

12/05/2016 Memorandum - Other
Filed by Thomas Pulliam (Defendant)

12/05/2016 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR SANCTIONS

12/05/2016 DEFENDANT & CROSS-COMPLAINANT THOMAS PULLIAM'S MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS AND FOR SANCTIONS; ETC.

12/05/2016 Declaration
Filed by Thomas Pulliam (Defendant)

12/05/2016 Declaration
Filed by Thomas Pulliam (Defendant)

12/05/2016 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR SANCTIONS

12/05/2016 DECLARATION OF MARK DELROSARIO, ESQ. IN SUPPORT OF DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES AND FOR SANCTIONS

12/05/2016 DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S MEMORANDUM IN OPPOSITION TO PLAINTIFFSD MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES AND FOR SANCTIONS; DECLARATION OF MARK DELROSARIO, ESQ.; REQUEST FOR \$13,469.00 IN SANCTIONS.

12/05/2016 DEFENDANT & CROSS- COMPLAINANT THOMAS PULLIAM'S MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR SANCTIONS; DECLARATION OF MARK DELROSARIO, ESQ.; REQUEST FOR \$11,649.00 IN SANCTIONS

12/05/2016 Declaration

Filed by Thomas Pulliam (Defendant)

12/05/2016 Memorandum - Other

Filed by Thomas Pulliam (Defendant)

12/05/2016 Memorandum - Other

Filed by Thomas Pulliam (Defendant)

12/05/2016 Declaration

Filed by Thomas Pulliam (Defendant)

11/23/2016 NOVEMBER 22, 2016 PROOF OF SERVICE FOR PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES

11/23/2016 Declaration

Filed by Plaintiff/Petitioner

11/23/2016 PLAINTIFF'S AMENDED NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES TO ADMISSIONS;

11/23/2016 PLAINTIFF'S SEPARATE STATEMENT IN SUPPORT OF IT'S COMPEL FURTHER RESPONSES TO REQUEST FOR ADMISSIONS SET-1

11/23/2016 DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES REQUEST FOR MONETARY SANCTIONS IN THE AMOUNT OF \$7,360.00

11/22/2016 PLAINTIFF'S NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES TO ADMISSIONS; ETC.

11/17/2016 AMENDED SEPARATE STATEMENT IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES FOR REQUEST FOR PRODUCTION OF DOCUMENTS SET-1

11/17/2016 Miscellaneous-Other

Filed by Siftly.com, LLC (Plaintiff)

11/17/2016 Declaration

Filed by Plaintiff/Petitioner

11/17/2016 NOTICE OF LIMITED SCOPE REPRESENTATION

11/17/2016 AMENDED SEPARATE STATEMENT IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1

11/17/2016 Proof of Service

11/17/2016 NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL

11/17/2016 MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS; REQUEST FOR SANCTIONS \$5,305.50

11/17/2016 DECLARATION IN SUPPORT OF ATTORNEY'S MOTION TO BE RELIEVED AS COUNSEL

11/17/2016 NOTICE OF LIMITED SCOPE REPRESENTATION; ETC.

11/17/2016 DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION, SET-1; REQUEST FOR MONETARY SANCTIONS

11/17/2016 DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1; REQUEST FOR MONETARY SANCTIONS IN THE AMOUNT OF \$10,088.25

11/17/2016 Notice

Filed by Frank Striefler (Plaintiff)

11/17/2016 AMENDED PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1; REQUEST FOR MONETARY SANCTIONS IN THE AMOUNT OF \$10,088.25.

11/17/2016 Proof of Service (not Summons and Complaint)

Filed by Siftly.com, LLC (Plaintiff)

11/17/2016 Notice

Filed by Frank Striefler (Plaintiff)

11/16/2016 NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL CIVIL

11/14/2016 DECLARATION IN SUPPORT OF ATTORNEY'S MOTION TO BE RELIEVED AS COUNSEL CIVIL

11/14/2016 NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL CIVIL

11/14/2016 Motion to Be Relieved as Counsel

Filed by Plaintiff/Petitioner

11/07/2016 Proof of Service

11/07/2016 Proof of Service (not Summons and Complaint)

Filed by Siftly.com, LLC (Plaintiff)

11/04/2016 COMPENDIUM OF EXHIBITS IN SUPPORT OF: PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO PRODUCTION OF DOCUMENTS

11/04/2016 Motion to Compel

Filed by Siftly.com, LLC (Plaintiff)

11/04/2016 Motion to Compel

Filed by Siftly.com, LLC (Plaintiff)

11/04/2016 Miscellaneous-Other

Filed by Siftly.com, LLC (Plaintiff)

11/04/2016 DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES; REQUEST FOR MONETARY SANCTIONS

11/04/2016 MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS; REQUEST FOR SANCTIONS \$5,305.50

11/04/2016 SEPARATE STATEMENT IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES

10/27/2016 at 08:30 AM in Department 32

Ex-Parte Proceedings (Ex Parte Motion; Denied) -

10/27/2016 SEPARATE STATEMENT IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1

10/27/2016 Miscellaneous-Other

Filed by Siftly.com, LLC (Plaintiff)

10/27/2016 DECLARATION OF PLAINTIFF'S ASSOCIATE COUNSEL IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-1; REQUEST FOR MONETARY SANCTIONS IN THE AMOUNT OF \$10,08&25

10/27/2016 EX PARTE APPLICATION TO EXTEND 45-DAY DEADLINE TO FILE MOTIONS TO COMPEL FURTHER RESPONSES;
DECLARATION OF COUNSEL

10/27/2016 PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO FORM INTERROGATORIES SET-I; REQUEST FOR
MONETARY SANCTIONS IN THE AMOUNT OF \$10,088.25.

10/27/2016 Minute Order

10/27/2016 Declaration
Filed by Siftly.com, LLC (Plaintiff)

10/27/2016 Ex-Parte Application
Filed by Siftly.com, LLC (Plaintiff)

10/27/2016 Motion to Compel
Filed by Siftly.com, LLC (Plaintiff)

10/27/2016 Motion to Compel
Filed by Siftly.com, LLC (Plaintiff)

10/03/2016 Answer to Cross-Complaint
Filed by Siftly.com, LLC (Plaintiff)

10/03/2016 PLAINTIFFS AND CROSS-DEFENDANTS' ANSWER TO CROSS-COMPLAINT.

09/23/2016 CIVIL DEPOSIT

09/16/2016 STIPULATION TO ACCEPT ELECTRONIC SERVICE OF DOCUMENTS

09/16/2016 Stipulation
Filed by Siftly.com, LLC (Plaintiff); Frank Striefler (Plaintiff)

09/13/2016 at 08:30 AM in Department 32
Case Management Conference (Conference-Case Management; Trial Date Set) -

09/13/2016 NOTICE OF CASE MANAGEMENT CONFERENCE RULING

09/13/2016 Minute Order

09/13/2016 Case Management Order
Filed by Court

09/13/2016 CASE MANAGEMENT ORDER

09/12/2016 DEFENDANT THOMAS PULLIAM'S FIRST AMENDED ANSWER TO THE FIRST AMENDED COMPLAINT

09/12/2016 CASE MANAGEMENT STATEMENT

09/12/2016 Amended Answer
Filed by Thomas Pulliam (Defendant)

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:
TOP 01/05/2017 09/09/2016

09/09/2016 Case Management Statement
Filed by Thomas Pulliam (Defendant)

09/09/2016 CASE MANAGEMENT STATEMENT

08/16/2016 at 08:30 AM in Department 32
Case Management Conference (Conference-Case Management; Continued by Court) -

08/16/2016 Cross-Complaint
Filed by Thomas Pulliam (Defendant)

08/16/2016 Minute Order

08/16/2016 Answer to First Amended Complaint
Filed by Defendant/Respondent

08/16/2016 DEFENDANT THOMAS PULLIAM'S ANSWER TO THE FIRST AMENDED COMPLAINT

08/16/2016 CROSS-COMPLAINT FOR DAMAGES AND EQUITABLE RELIEF FOR: 1. BREACH OF FIDUCIARY DUTY ; ETC

07/28/2016 REQUEST FOR ENTRY OF DEFAULT 1ST AMENDED COMPLAINT

07/28/2016 Notice
Filed by Siftly.com, LLC (Plaintiff); Frank Striefler (Plaintiff)

07/28/2016 Request for Entry of Default / Judgment
Filed by Plaintiff/Petitioner

07/28/2016 NOTICE OF CONTINUED CASE MANAGEMENT CONFERENCE

07/19/2016 at 08:30 AM in Department 32
Case Management Conference (Conference-Case Management; Continued by Court) -

07/19/2016 Minute Order

07/12/2016 Request for Entry of Default / Judgment
Filed by Plaintiff/Petitioner

07/12/2016 REQUEST FOR ENTRY OF DEFAULT

06/21/2016 at 08:30 AM in Department 32
Case Management Conference (Conference-Case Management; Continued by Court) -

06/21/2016 Minute Order

06/17/2016 Case Management Statement
Filed by Siftly.com, LLC (Plaintiff)

06/17/2016 PROOF OF SERVICE OF SUMMONS

06/17/2016 Proof of Service (not Summons and Complaint)
Filed by Siftly.com, LLC (Plaintiff)

06/17/2016 CASE MANAGEMENT STATEMENT

05/23/2016 FIRST AMENDED COMPLAINT

05/23/2016 First Amended Complaint
Filed by Siftly.com, LLC (Plaintiff)

05/09/2016 Notice of Change of Address or Other Contact Information
Filed by Siftly.com, LLC (Plaintiff); Frank Striefler (Plaintiff)

05/09/2016 NOTICE OF CHANGE OF ADDRESS OR OTHER CONTACT INFORMATION

04/21/2016 Notice of Case Management Conference
Filed by Clerk

04/21/2016 NOTICE OF CASE MANAGEMENT CONFERENCE

03/25/2016 at 08:30 AM in Department 52
Unknown Event Type - **Held - Motion Granted**

03/25/2016 Minute Order

03/21/2016 PEREMPTORY CHALLENGE BY PLAINTIFFS SIFTLY.COM LLC AND FRANK STRIEFLER PURSUANT TO CODE OF CIVIL PROCEDURE SECTION 170.6; DECLARATION OF SALVATORE PICARIELLO

03/21/2016 Challenge To Judicial Officer - Peremptory (170.6)
Filed by Siftly.com, LLC (Plaintiff)

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PROOF OF SERVICE
STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen (18) years and not a party to the above-entitled action; my business address is 12121 Wilshire Blvd. Ste 525 Los Angeles CA 90025

On **January 3 2019** I served the following document(s) described as **Response to Notice of Disciplinary Charges and Request for Discovery** upon the following interested party(ies)

Office of the Chief Trial Counsel
845 S. Figueroa St.
Los Angeles, CA 90017
213-765-1000

(BY MAIL) I am readily familiar with our office's practice for collection and processing of correspondence and other materials for mailing with the United States Postal Service and the fact that the correspondence would be deposited in the United States Mail that same day in the ordinary course of business. I placed each such envelope for collection and mailing at the above business address, following our office's ordinary business practices. The envelope(s) will be deposited in the United States Mail on this date, in the ordinary course of business.

(BY FACSIMILE) I transmitted the document identified above to a facsimile machine(s) maintained by the person(s) on whom it is served at the telephone number for the facsimile machine as last given by that person on any document which he or she has filed in the cause and served on the party making the service. Transmission confirmation attached hereto.

(BY ELECTRONIC SERVICE) I electronically served the documents identified above to the electronic service address above from my electronic service address, and have an electronic record of the service to prove the same.

(BY PERSONAL SERVICE) I personally delivered such envelope by hand to the residence of the addressee(s).

(STATE) I declare under penalty of perjury under the law of the State of California that the above is true and correct.

Executed this **January 3, 2019** at Los Angeles, California.



Amir Dibaei

PROOF OF SERVICE